

COHEN & GREEN

April 26, 2024

Hon. Ona T. Wang, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case above. As directed by the Court, because today is the last Friday of the month, below is Plaintiff's monthly status report.

With a few updates, the parties remain largely in the same place they were at the conference earlier this month. First, Defendants have served — as discussed at the conference — closing reports for certain CCRB cases involving the individual Defendants. Second, Defendants have served their first ESI production, consisting of four (essentially blank) individual emails with substantive attachments.¹ Our understanding is that this is the first in a series of rolling productions.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/ Pronouns: Mx., they/ their/ them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.

¹ Because of what appears to be a processing/file-type issue, certain attachments called "Report.arrestfolder.upload" were replaced with a slipsheet indicating a "technical issue" (case altered). We've followed up with Defendants yesterday to try to understand what the native file type is and whether there is a substantive file or other substantive documents that these files indicate (my understanding, based on context and other knowledge, is that this file is likely an applet or link that opens a shared folder or database of some kind). The parties are still discussing this and I see no reason to think we will not resolve this issue on our own.